

MARIO N. ALIOTO, ESQ. (56433)
LAUREN C. CAPURRO, ESQ. (241151)
TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP
2001 Union Street, Suite 482
San Francisco, CA 94123
Telephone: (415) 563-7200
Facsimile: (415) 346-0679
E-mail: malioto@tatp.com
lauren russell@tatp.com

Lead Counsel for the Indirect-Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

| | | |
|---------------------------------|---|---------------------------------------|
| IN RE CATHODE RAY TUBE (CRT) |) | MDL NO. 1917 |
| ANTITRUST LITIGATION |) | |
| _____ |) | Case No. 07-cv-5944-JST |
| |) | |
| This Document Relates to: |) | INDIRECT PURCHASER PLAINTIFFS’ |
| |) | ADMINISTRATIVE MOTION TO |
| Indirect Purchaser Class Action |) | CONSIDER WHETHER ANOTHER |
| |) | PARTY’S MATERIAL SHOULD BE |
| |) | SEALED PURSUANT TO CIVIL LOCAL |
| |) | RULES 7-11 AND 79-5(f) |
| |) | |
| |) | |
| |) | The Honorable Jon S. Tigar |
| |) | |
| |) | |
| _____ |) | |

Pursuant to Civil Local Rules 7-11 and 79-5(f), the Indirect Purchaser Plaintiffs (“IPPs”) hereby move the Court to consider whether material designated as confidential by defendants Irico Group Corporation and Irico Display Devices Co., Ltd. (“Irico”).

IPPs have reviewed and complied with this Court’s Standing Order Governing Administrative Motions to File Materials Under Seal Before District Judge Jon S. Tigar (Mar. 14, 2022) and Civil Local Rule 79-5, including the requirement to file separate motions if a party seeks to file under seal a document containing “portions that more than one party bears the burden of showing is sealable.” Civil L.R. 79-5(f)(5). This motion relates solely to materials designated confidential by Irico. IPPs are filing the following documents designated by Irico as “CONFIDENTIAL” under the terms of the Stipulated Protective Order, ECF No. 306, provisionally under seal:

| Document Filed Provisionally Under Seal | Designating Entity |
|--|---|
| Ex. 11 to Dever Decl. In Support of IPPs’ Response to Irico Defendants’ MIL No. 4 IRI-CRT-00001155 (Chinese original and certified English translation) | Irico Group Corporation and Irico Display Devices Co., Ltd. |
| Ex. 14 to Dever Decl. In Support of IPPs’ Response to Irico Defendants’ MIL No. 4 (IRI-CRT-00023923-24 (Chinese original and certified English translation)) | Irico Group Corporation and Irico Display Devices Co., Ltd. |
| Ex. 16 to Dever Decl. In Support of IPPs’ Response to Irico Defendants’ MIL No. 4 (IRI-CRT-00033206-09 (Chinese original and certified English translation)) | Irico Group Corporation and Irico Display Devices Co., Ltd. |

Civil Local Rule 79-5 governs the filing under seal of documents in civil cases. In compliance with Civil Local Rule 79-5(f), IPPs submit this Motion in order to file (a) material designated by Irico pursuant to the Stipulated Protective Order, ECF No. 0306, as “Confidential” or “Highly Confidential;” or (b) references to or quotations from material or data designated by Irico pursuant to the Stipulated Protective Order as “Confidential” or “Highly Confidential.” IPPs

1 seek to file the above material under seal in good faith in order to comply with the Protective Order
 2 in this action and the applicable Local Rules. Under Civil L.R. 79-5(c) and (f), the parties that
 3 contend the material they have designated is confidential in nature bear the burden to establish that
 4 the designated information meets the requirements for sealing. *See Kamakana v. City of Honolulu*,
 5 447 F.3d 1172, 1178-80 (9th Cir. 2006). IPPs understand that, given the Court's direction at the
 6 hearing on Direct Purchaser Plaintiffs' November 19, 2021 sealing motion (ECF No. 5966), the
 7 designated materials subject to this motion may not qualify for filing under seal. IPPs contacted
 8 Irico prior to filing this motion and requested that Irico permit IPPs to file these documents in the
 9 public record, but Irico declined to do so. Accordingly, IPPs respectfully submit this administrative
 10 motion pursuant to the Stipulated Protective Order and Civil Local Rule 79-5(f).

11 Dated: September 1, 2023

12 By: /s/ Lauren C. Capurro

13 Mario N. Alioto (56433)
 14 Lauren C. Capurro (241151)
 15 TRUMP, ALIOTO, TRUMP & PRESCOTT LLP
 16 2001 Union Street, Suite 482
 17 San Francisco, CA 94123
 18 Telephone: (415) 563-7200
 19 Facsimile: (415) 346-0679
 20 Email: malioto@tatp.com
 21 lauren russell@tatp.com

22 *Lead Counsel for Indirect Purchaser Plaintiffs*